

**REMARKS**

Claims 1-7 are active in the application. Claim 1 has been amended. Claims 2-7 are unchanged.

5        Claims 1-7 were rejected under 35 USC 101 as being directed to non-statutory subject matter. In response to these rejections, claim 1 has been amended to include the step of “implementing business practice changes in accordance with the capability model”. This implementation step embodies a useful, concrete and tangible result required in by the two-prong test set forth in the Office Action. Business practice changes  
10 necessarily involve concrete, tangible changes to physical actions.

          Additionally, it is noted that the present application claims a process, and processes constitute statutory subject matter. Also, the present customer relationship management process advances the useful art of business methods. The process as claimed produces a useful tangible result that enhances business efficiency and customer  
15 satisfaction. Hence, the claims meet the requirements of 35 USC 101, and the rejections based on 35 USC 101 must be withdrawn.

          Claims 1-7 were rejected under 35 USC 102(b) as being anticipated by the article “Closing the Loop on Loyalty” by Goodwin et al. These rejections are traversed.

          There are two key differences between Goodwin et al. and the present invention.

20        Firstly, Goodwin fails to provide the methods and techniques to support customer relationship management. Goodwin et al. provides little in the way of practical advice and guidance to those in the profession responsible for achieving customer relationship management (CRM) objectives. Goodwin et al. provides a useful abstract discussion of CRM, but does not provide a method for achieving CRM. The present invention, by  
25 contrast provides a specific, repeatable method for achieving CRM.

          Secondly, Goodwin et al. is focused on customer value management (CVM) and how to measure customer value. Goodwin et al. is not concerned with implementing CRM. Goodwin et al. focuses on monitoring, measuring and assigning a value to customer loyalty. To achieve customer loyalty and satisfaction, however, much more is  
30 needed than merely a good measurement system.

Goodwin et al. outlines several market conditions and some of the changes companies would have to go through to become “customer-centric”, and the associated changes required in company organization. However, Goodwin et al. does not discuss how to implement CRM or the CRM implications of actually following CRM methods.

5 Most companies are well aware that measuring and considering customer attitudes are important. However, most companies fail when it comes to leveraging customer information. The present invention, unlike Goodwin et al., provides a detailed, repeatable method for leveraging customer attitudes into business practice changes. Goodwin et al. simply fails to teach a specific process.

10 There are several statements in Goodwin et al. illustrating the lack of a specific method for implementing CRM. For example, Goodwin states:

1) *“The survey results also can help align the management team around what customers value”*. (43) However, Goodwin does not provide any specific method for mapping the survey results to customer values. Also, Goodwin does not provide a  
15 specific method for identifying the customer attributes that are the best predictors for CRM success. These specific method steps are important in the present method, but they are not taught or suggested in Goodwin et al.

Steps for mapping survey results to customer values in the present invention include (a), (b), (c), and (d). Goodwin lacks steps (a), (b), (c), and (d). These steps can  
20 be more fully understood from Tables 1 and 2 of the present specification.

2) *“The challenge is to synthesize the information into non-contradictory actionable data”*. (47) However, Goodwin does not provide specific methods for generating actionable data. Goodwin only discusses the theoretical importance of customer relationships and customer value.

25 Steps for generating actionable data in the present invention include (e), (f) and (g). These steps create actionable data by aligning customer requirements with the company’s direction through a process of selection based upon hypotheses from “CRM Best Practices” for Capabilities and Enablers. Where gaps are identified specific actions are detailed for either process improvement, organizational change or technology  
30 upgrade. These details are contained within the Capability Model that is developed.

Goodwin lacks any teaching or suggestion of generating actionable data as set forth in steps (e) (f) and (g).

3) *"By agreeing on the priorities beforehand, the survey results are less likely to be misdirected toward supporting "hidden agendas" or maintaining the status quo"* (40).

5 Absent from Goodwin et al. is any teaching or suggestion for obtaining this agreement on priorities. Obtaining agreements for priorities is very important for CRM. The present invention provides a specific, repeatable method for doing so; Goodwin et al. does not.

Steps for obtaining agreement on priorities in the present invention include (h), (i), (j) and (k) which improve customer focused processes and channels to ensure that the  
 10 customer centric enterprise strategy can be realized (as defined in 1(e)). By validating the differences between the inside-out view (from external customer data) and outside-in view (from company internal data), a prioritization process centered around Moments of Truths for developing customer value that will result in achieving the company's business objectives. This series of alignments ensure that there is consensus from all the company  
 15 stakeholders regarding their customers' needs and wants. Goodwin is silent about how to obtain agreement on priorities (although Goodwin does recognize that obtaining agreement is important).

The present claims set forth a specific, repeatable method for implementing CRM, and for generating actionable decisions. The present method generates outcomes that  
 20 dictate tangible changes and improvements to customer relationship management. As discussed in the present specification, the present method includes (a) constructing an engagement model (b) phases (c) activities, and (e) generation of work products. When combined with CRM best practices known in the art, the present method produces tangible results that are repeatable.

25 Goodwin describes Customer Value Management as a way to assign value to customer satisfaction and loyalty. Hence, Goodwin describes measurement considerations for after the fact analysis. The Customer Loyalty method describes steps for action that will implement new and/or improved capabilities and enables for driving CRM success based upon process, organization and technology.

30 Steps absent from Goodwin and required by the present invention include steps in the flowcharts of Figs. 2-5. Specific steps absent from Goodwin include steps (a), (b) (e),

(f), (g) (h), (k), (l), (m) (n), and (o). These steps in combination tend to produce actionable data, which is distinct from Goodwin.

Significantly, Goodwin also lacks step (p), which requires implementing the capability model. Since Goodwin does not generate specific actionable data, it is impossible for Goodwin to implement any business practice changes.

In conclusion, Goodwin discusses the goals of CRM without explaining how to accomplish them. Goodwin does not provide a specific, repeatable method for implementing CRM.

Accordingly, the Goodwin et al. article fails to anticipate the present claims. Specifically, Goodwin does not disclose any of the steps of the present invention as they are combined and integrated together. Accordingly, the rejections of claims 1-7 based on the Goodwin et al. reference are traversed.

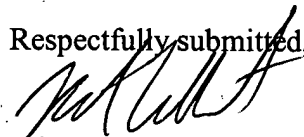
In view of the foregoing, it is respectfully requested that the application be reconsidered, that claims 1-7 be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

A provisional petition is hereby made for any extension of time necessary for the continued pendency during the life of this application. Please charge any fees for such provisional petition and any deficiencies in fees and credit any overpayment of fees for the petition or for entry of this amendment to Deposit Account 09-0458

(International Business Machines Corporation - Fishkill).

Respectfully submitted,

  
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